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January 6, 2025

BY ECF

Hon. Trina L. Thompson
 San Francisco Courthouse, Courtroom 9
 450 Golden Gate Avenue
 San Francisco, CA 94102

Re: *Yotta Technologies Inc. v. Evolve Bancorp, Inc., et al.*, No. 3:24-cv-06456-TLT

Dear Judge Thompson,

We represent Yotta Technologies, Inc. and, pursuant to the Court's January 3, 2025 Order directing the Parties to submit a proposed schedule, we write on behalf of all Parties to the above-captioned action. The Parties respectfully propose that discovery proceed as follows:

EVENT	DATE OR DEADLINE
Deadline to Add Parties or Amend Pleadings	60 Days After Resolution of Motions To Dismiss
Completion of Initial ADR Session	April 30, 2025
Fact Discovery Cutoff	December 19, 2025
Initial Expert Reports and Disclosures	February 17, 2026
Rebuttal Expert Reports	March 19, 2026
Expert Discovery Cutoff	April 20, 2026
Last Day to Hear Dispositive Motions	June 4, 2026

Evolve Bancorp contends that discovery against it is improper until this Court resolves its jurisdictional challenge and contends that discovery against it should be stayed. Plaintiff opposes a stay. The Parties will meet and confer with respect to this discovery dispute.

Yours truly,

/s/ Rishi Bhandari

Rishi Bhandari